

1 Isaac D. Zorea
Law Office of Isaac Derek Zorea
2 P.O. Box 210434
Anchorage, AK 99521
3 (907) 677-3779
(907) 644-2802 facsimile
4

5 IN THE UNITED STATES DISTRICT COURT
6 FOR THE DISTRICT OF ALASKA

7 CAROLYN MITCHELL,)
8)

Plaintiff,)

9 vs.)

10 ANCHORAGE POLICE DEPARTMENT and the)
MUNICIPALITY OF ANCHORAGE, a)
11 municipal corporation, WALTER MONEGAN,)
Officer HENIKMAN, and Officer J. VOSS,)
12)

13 Defendants.)

Case No. 3:05-cv-00273-JWS

14 **STIPULATION TO ADJUST PRE-TRIAL DEADLINES**

15 The parties, through their respective counsel, stipulate and agree to adjust
16 discovery and pre-trial deadlines, with this Court's approval. The requested
17 adjustments have become necessary because the parties have been working on
18 agreeing to a protective order concerning documents Plaintiff has requested during
19 discovery. As a result of the pending discourse concerning these discovery
20 documents, and Defendants' request for a protective order, discovery has not closed
21 in this case. No new discovery is being sought, however requested documents have
22 not been exchanged between parties.
23

24 The parties request that discovery be deemed closed when all documents
25 requested in discovery have been exchanged. Further, the parties request that the
26 deadline for all dispositive motions be set for 30 days after receipt of all discovery
27 documents.
28

1 A proposed Order is submitted herewith.

2 Respectfully submitted this 18th day of January, 2007.

3
4 By: s/ Moshe C. Zorea (consent given)
5 Co-Counsel for Carolyn Mitchell
6 7540 E. 17th Avenue
7 Anchorage, Alaska 99504
8 Phone: (907) 337-7741
9 Fax: (907) 337-2737
10 E-mail: moshez@yahoo.com
11 Alaska Bar No. 8406055

12
13 Respectfully submitted this 18th day of January, 2007.

14 JAMES N. REEVES
15 Municipal Attorney

16 By: s/ Joyce Weaver Johnson (consent given)
17 Municipal Attorney's Office
18 P.O. Box 196650
19 Anchorage, Alaska 99519-6650
20 Phone: (907) 343-4545
21 Fax: (907) 343-4550
22 E-mail: uslit@muni.org
23 Alaska Bar No. 9306029

24
25 Respectfully submitted this 18th day of January, 2007.

26 By: s/ Isaac Derek Zorea
27 Co-Counsel for Carolyn Mitchell
28 P.O. Box 210434
Anchorage, Alaska 99521
Phone: (907) 830-1385
Fax: (907) 677-3779
E-mail: eyedz@gci.net
Alaska Bar No. 0011090

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

The undersigned hereby certifies that on 1/1/07
a true and correct copy of the Joint Motion to Adjust
Pre-Trial Deadlines& Proposed Order was served on:

Joyce Weaver Johnson

by first class regular mail, if noted above, or by electronic means
through the ECF system as indicated on the notice of elctronic
filing.

By: s/ Isaac Derek Zorea
Co-Counsel for Carolyn Mitchell
P.O. Box 210434
Anchorage, Alaska 99521
Phone: (907) 830-1385
Fax: (907) 677-3779
E-mail: eyedz@gci.net
Alaska Bar No. 0011090